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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

LHF PRODUCTIONS, INC., CRIMINAL
PRODUCTIONS, INC., ME2
PRODUCTIONS, INC., CELL FILM
HOLDINGS, LLC, COOK
PRODUCTIONS, LLC, HYBRID, LLC
and I AM WRATH PRODUCTION,
INC. ,

Plaintiffs,

v.

JOHN STEVEN DODDS, A/K/A J.
STEVE DODDS,

Defendant.

Case No. 3:17-cv-00155-AC

DEFENDANT'S ANSWER TO
PLAINTIFFS' FIRST AMENDED
COMPLAINT

JURY TRIAL DEMANDED

Defendant answers the First Amended Complaint as follows:

JURISDICTION AND VENUE

1. Admit.
2. Admit.
3. Admit.

PARTIES

PLAINTIFF

4. Defendant admits that Plaintiffs are motion pictures rights holders, and that Defendant downloaded Plaintiffs' motion pictures. Defendant denies that he "re-distributed" the motion pictures.

5. Admit.

6. Deny.

7. Defendant is without knowledge or information sufficient to form a belief and therefore denies.

8. Admit.

9. Defendant is without knowledge or information sufficient to form a belief and therefore denies.

10. Defendant is without knowledge or information sufficient to form a belief and therefore denies.

LHF

11. Admit.

12. Admit.

13. Admit.

CPI

14. Admit.

15. Admit.

16. Admit.

ME2

17. Admit.

18. Admit.

19. Admit.

CELL

20. Admit.

21. Admit.

22. Admit.

Cook

23. Admit.

24. Admit.

25. Admit.

26. Admit.

HYBRID

27. Admit.

28. Admit.

29. Admit.

WRATH

30. Admit.

31. Admit.

32. Admit.

THE DEFENDANT

33. Defendant acknowledges that he was assigned the IP address

73.67.148.141 by his ISP and his IPA was used to download the motion pictures.

Defendant is without knowledge or information sufficient to form a belief as to the balance of the statement and therefore denies.

34. Defendant admits he used Bittorrent to download Plaintiffs' films without permission. Paragraph 34 calls for a legal conclusion to which no response is required.

35. Defendant admits he occasionally receives notices regarding download of copyrighted material from his ISP, and upon receiving a notice would act promptly to delete material identified in the notice.

36. Defendant does not recall receiving the notice in Exhibit 8, and therefore is without information sufficient to form a belief and denies.

37. Defendant admits receiving notice of this action, and that he continued to use Bittorrent after receiving notice. The balance of the claim is denied.

38. Deny.

39. Deny.

PEER-TO-PEER INTERNET PIRACY IN GENERAL

Operation

40. Defendant admits that Bittorrent is a tool allowing peer-to-peer networks to share large amounts of information, including motion pictures. Defendant is without knowledge or information sufficient to form a belief as to the balance of the statement and therefore denies.

41. Admit.

42. Deny.

43. Deny.

44. Admitted that Defendant has downloaded the motion pictures and that they would be available for selection as part of a Bittorrent swarm. Defendant is without

knowledge or information sufficient to form a belief as to the balance of the statement and therefore denies.

The Business of Piracy

45. The allegations of Paragraph 45 are not directed towards Defendant and therefore no response is required. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief and therefore denies the same.

46. The allegations of Paragraph 46 are not directed towards Defendant and therefore no response is required. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief and therefore denies the same.

47. Defendant is without knowledge or information sufficient to form a belief and therefore denies.

48. The allegations of Paragraph 48 are not directed towards Defendant and therefore no response is required. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief and therefore denies the same.

49. The allegations of Paragraph 49 are not directed towards Defendant and therefore no response is required. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief and therefore denies the same.

50. Defendant admits he was a user of the BitTorrent distribution system, but denies the remaining allegations of Paragraph 50.

Harm to Plaintiff and Others

51. Defendant is without knowledge or information sufficient to form a belief and therefore denies.

52. Defendant is without knowledge or information sufficient to form a belief and therefore denies.

53. The allegations of Paragraph 53 are not direct towards defendant and

therefore no response is required. To the extent a response is required, and if accurately reported, Senator Levin's testimony speaks for itself.

54. Defendant is without knowledge or information sufficient to form a belief and therefore denies.

55. The allegations of Paragraph 55 are not direct towards Defendant and therefore no response is required. To the extent a response is required, and if accurately reported, House Memorial 2 speaks for itself.

56. The allegations of Paragraph 56 are an opinion to which no response is required. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief and therefore denies the same.

57. The allegations of Paragraph 57 are an opinion to which no response is required. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief and therefore denies the same.

CAUSE OF ACTION

(Federal Copyright Infringement)

58. Defendant admits and denies the allegations realleged in Paragraph 58 as previously admitted and denied hereinabove.

59. Defendant admits he downloaded the motion pictures, but is without knowledge or information sufficient to form a belief as to the remaining allegations of Paragraph 59 and therefore denies.

60. Paragraph 60 calls for a legal conclusion to which no response is required. To the extent a response is required, Defendant denies the same.

61. Deny.

62. Paragraph 62 calls for a legal conclusion to which no response is required. To the extent a response is required, Defendant denies the same.

63. Deny.

64. Deny.

65. Deny.

66. Except as expressly admitted herein, Defendant denies each and every allegation of the First Amended Complaint.

PRAYER FOR RELIEF

WHEREFORE Defendant prays for judgment as follows:

- 1) That Plaintiff's Complaint be dismissed and Plaintiff take nothing thereby;
- 2) For Defendant's costs disbursements, and reasonable attorney fees pursuant to 17 U.S.C. §505; and
- 3) Any additional relief deemed appropriate by this Court.

DATED July 24, 2017

IMMIX LAW GROUP PC

By /s/ Leigh F. Gill
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